

**REMARKS**

Claims 1-21 are pending in the application.

Claims 1-21 have been rejected.

Claims 1, 8, and 19-21 have been amended.

**Rejection of Claims Under 35 U.S.C. § 102**

Claims 1-5, 8-16 and 19-21 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent 6,826,600 issued to Russell, ("Russell"). *See* Office Action, p. 2. Applicants traverse this rejection.

**Claim 1**

Regarding claim 1, Applicants have previously argued that the cited sections of Russell, as interpreted by the Office Action, fail to teach the limitation requiring that "the modified first storage object maintains the property" recited in claim 1. The basis of this argument was that the Office Action

1. equates Russell's local object specification 150 with the first storage object of claim 1 (*See* Office Action, pp. 2 and 7),
2. equates Russell's global object specification 160 with the second storage object of claim 1 (*See* Office Action, pp. 2 and 7),
3. equates Russell's local object identification 152, which is a component of Russell's local object specification 150, with the property of the first storage object of claim 1 (*See* Office Action, p. 2 ), and

4. equates Russell's teaching of the replacement of local object specification 150 with global object specification 160 with the modifying of the first storage object recited in claim 1 (*See* Office Action, pp. 3 and 7).

Thus, since

1. Russell also teaches that global object specification 160 no longer contains local object identification 152 (*See*, for example, FIG. 3 of Russell, which shows that global object specification 160 contains global object identification 162, not local object identification 152, and see column 14, lines 29-62 of Russell, which states that "server 132 replaces local object identification 152 with a global object identification 162"), it follows that (using the terms of claim 1) Russell teaches that
2. the modified first storage object (local object specification 150 replaced with global object specification 160) does not have the property recited in claim 1 (local object identification 152), and, therefore,
3. Russell fails to teach the limitation requiring that "the modified first storage object maintains the property" recited in claim 1.

The Office Action responded to this argument by stating that

Russell teaches the modification or replacement of the local object specification (i.e., the first storage object) with the global object specification (i.e., the second object) such the new replaced local object specification maintains the property upon which the global storage object depends because the client is requested to compare the global object specification to the local object specification to determine whether the server properly created the global object specification based on the local object specification.

*See* Office Action p. 7. However, since the proper creation of the global object specification guarantees that the global object specification fails to contain local object identification 152, determining proper creation not only fails to teach maintenance of the

property of the first storage object, but, in fact, teaches determining that the first storage object fails to maintain the property recited in claim 1.

Thus, for at least these reasons, the Applicants respectfully submit that the force of their argument still holds, and that the response given to this argument in the Office Action provides even more reason to uphold the argument.

Nevertheless, in order to expedite prosecution, the Applicants have amended claim 1 to recite that “the second storage object comprises a component storage object” and that the computer system chooses “the first storage object to be the component storage object due to the property of the first storage object.” Thus, since the cited sections of Russell fail to teach that global object definition 160 (which the Office Action equates with the second storage object of claim 1) comprises local object definition 150 (which the Office Action equates with the first storage object of claim 1), Russell fails to teach or fairly suggest all the limitations of claim 1.

Thus, for at least these reasons, the Applicants respectfully request the Examiner’s reconsideration and withdrawal of this rejection against claim 1.

#### Claim 8

Regarding claim 8, Applicants have previously argued that the cited sections of Russell, as interpreted by the Office Action, fail to teach the limitation requiring that the computer system receives information that the second storage object can no longer depend on the individual or collective properties of the one or more first storage objects. In response to this argument the Office Action replies that this limitation is “clearly recited in Russell” since “the global object specification can no longer depend upon local object identification when they are not properly map with each other (col. 18 lines 12-21).” But the only information that is discussed by the cited reference (Russell,

column 18, lines 12-21) as being sent or received is “an indication of an error back to the server,” which “indicates to the sever 132 that it did not properly map the local object specification 150 to the global object specification 160.” Applicants submit that it is clearly not reasonable for the Examiner to assert that an indication of a failure to properly create global object specification 160 due to a failure to perform a proper mapping can be read as teaching that the second storage object can no longer depend on the individual or collective properties of the one or more first storage objects. This clearly goes beyond the bounds of the Examiner’s duty to broadly interpret claim language.

Nevertheless, the Applicants provide the following additional reason for traversing the rejection of claim 8: The cited sections of Russell fail to teach receiving together (1) information that at least one of the individual or collective properties of the one or more first storage objects has changed and (2) information that the second storage object can no longer depend on the individual or collective properties of the one or more first storage objects. At best the cited sections of Russell teach one or the other of these pieces of information being received, but not both together. In fact, according to the interpretation of Russell offered by the Office Action, Russell requires that only one or the other, but not both, of these pieces of information be received.

The Office Action asserts that Russell teaches the receipt of information concerning the change of the individual or collective properties by teaching the client modification or replacement of the local object specification 150 with the global object specification 160. *See* Office Action, p. 8. But Russell teaches that the local object specification 150 is replaced by the global object specification 160 *only if* the server properly creates global object specification 160. *See* Russell, column 11, lines 10-24 and column 18, lines 12-21. Thus, the cited sections of Russell teach that if the local object

specification 150 is replaced by the global object specification, no error message is sent back to the server 132. Since the Office Action equates the error message of Russell with claim 8's teaching of the receipt of information that the second storage object can no longer depend on the individual or collective properties of the one or more first storage objects, the interpretation of Russell offered by the Office Action requires that there be *no* receipt of information that the second storage object can no longer depend on the individual or collective properties of the one or more first storage objects (for the case in which local object specification 150 is successfully replaced).

In other words, if local object specification 150 is replaced, there is no error message sent or received. Likewise, if there is an error message sent or received, local object specification is not replaced. Thus, according to the interpretation of Russell offered by the Office Action, Russell teaches (at best) the receiving of one, but not both, of (1) information that at least one of the individual or collective properties of the one or more first storage objects has changed and (2) information that the second storage object can no longer depend on the individual or collective properties of the one or more first storage objects.

Thus, for at least these reasons, the Applicants respectfully request the Examiner's reconsideration and withdrawal of this rejection against claim 8.

#### Remaining Claims

Since the independent claims 12 and 19-21 are rejected for the same reasons as claim 1, and since they have been amended in the same fashion as claim 1, Applicants assert that they are patentable for the same reasons that claim 1 is patentable.

Since all remaining rejected claims are dependent upon one of the patentable independent claims 1, 8, 12, and 19-21 and are, therefore, patentable, the Applicants respectfully request the Examiner's reconsideration and withdrawal of this rejection.

*Rejection of Claims Under 35 U.S.C. § 103*

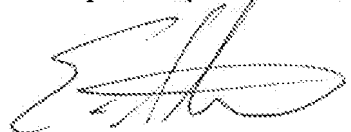
Claims 6-7 and 17-18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Russell in view of U.S. Patent 6,826,600 issued to Furuhashi et al., ("Furuhashi"). *See* Office Action, p. 6. Applicants traverse this rejection for at least the reason that claims 6-7 and 17-18 are dependent upon allowable base claims. Applicants, therefore, respectfully request the Examiner's reconsideration and withdrawal of this rejection.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5093.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. Applicant also hereby authorizes that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,



Eric A. Stephenson  
Attorney for Applicants  
Reg. No. 38,321  
Telephone: (512) 439-5093  
Facsimile: (512) 439-5099